

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

Vs.

Case # 17-097 (CCC)

[1] PABLO DÍAZ-RAMÍREZ,
Defendant.

**REQUEST FOR AUTORIZATION
TO REPRESENT DEFENDANT IN ANCILLARY MATTER**

TO THE HONORABLE COURT:

Comes now the Defendant through his undersigned attorney who respectfully alleges and prays as follows:

1. The undersigned attorney is CJA court-appointed counsel for Defendant.
2. The undersigned is requesting prior CJA authorization to represent Defendant in debriefings to be conducted by the local Department of Justice, beginning September 13, 2017, in regards to Defendant's knowledge concerning murders in the Caguas, Puerto Rico area. In this respect we inform the Court:

(a) defendant Pablo Díaz-Ramírez has been cooperating with the U.S. government prior to March 8, 2017.

(b) local Commonwealth of Puerto Rico prosecutor Darilou Rivera has communicated with the undersigned concerning the local Department of Justice's desire to interview the Defendant concerning his possible knowledge of murders in the Caguas, Puerto Rico area.

(c) the undersigned has communicated with AUSA Supervisor Alberto López and informed him of the local prosecutor's request to debrief Defendant. He has no objection to this request and has advised that should defendant cooperate with the local authorities said cooperation will be included in the government's U.S.S.G. §§ 5K1.1 motion. The undersigned has also communicated with the Defendant who has no objection to cooperating with the local prosecutors.

(d) pursuant to §§ 210.20.30(a) of the Criminal Justice Act Guidelines “representation may be furnished for financially eligible persons in “ancillary matters” appropriate to the proceedings” under §§ 3006(A)(c).

In the instant case, the Defendant has, and is cooperating with the government pursuant to a proffer letters signed on March 8, 2017 and May 4, 2017 and the supplemental cooperation Plea Agreement [ECF # 37-38] filed with the Court during his Change of Plea hearing on August 17, 2017. In accordance with said documents, Defendant’s cooperation will be taken into account in the government’s decision to file its §§ 5K1.1 motion and the extent of its recommendation as to the appropriate sentence. Since the government has no objection to Defendant’s cooperation with the local authorities to help clarify violent local crimes and will include said cooperation in its eventual §§ 5K1.1 motion, the defense is of the position that this cooperation with the local authorities is “ancillary” to Defendant’s cooperation with the federal government, and will contribute to the sentencing factors which this Court will consider in deciding Defendant’s sentence.

WHEREFORE, given the above, it is respectfully requested that this Honorable Court GRANT Defendant’s request to allow the undersigned attorney permission to represent the Defendant at debriefings with the local Department of Justice prosecutors and authorize the payment of CJA funds for these “ancillary matters” to be performed by the undersigned CJA counsel.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28Th day of August, 2017.

CERTIFICATE OF SERVICE: I Hereby Certify that on this, I caused the forgoing motion to be electronically filed with the Clerk of the Court using the CM/ECF system, which will **only provide copy to AUSA Jonathan Gottfried and AUSA Alberto López** and send notification of such filing to all attorneys of record.

/s/ José R Aguayo Caussade
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